
From: Amar Naik <ANaik@sheppardmullin.com>
Sent: Friday, September 11, 2020 3:08 PM
To: Massaroni, Christopher
Cc: Aundrea K Gulley; Dylan Ballard
Subject: RE: In re Dealer Management Systems Antitrust Litig., No. 1:18-cv-000864 (N.D. Ill.)
Attachments: Re: Documents and Testimony Produced by Auto/Mate in the In re DMS Antitrust Litigation; 2017-06-27 - Reynolds CID in File No. 171-0056.pdf; 2018-03-12 - Reynolds Subpoena (New York).pdf; 2018-10-09 - Reynolds Subpoena (Illinois).pdf

Chris,

Please find attached a copy of the correspondence from May 2019 referenced in Dylan's letter from yesterday.

Also, please see attached copies of the FTC's CID and relevant State AG subpoenas, which you received in May 2019 as well.

Best,
Amar

From: Dylan Ballard <dballard@sheppardmullin.com>
Sent: Friday, September 11, 2020 10:42 AM
To: Massaroni, Christopher <CMassaroni@hodgsonruss.com>
Cc: Aundrea K Gulley <agulley@gibbsbruns.com>; Amar Naik <ANaik@sheppardmullin.com>
Subject: RE: In re Dealer Management Systems Antitrust Litig., No. 1:18-cv-000864 (N.D. Ill.)

Chris, I am copying my co-counsel Andi Gulley and Amar Naik, who have been working on the MDL matter more recently than I have. I have to say I'm a little surprised that you would file a "motion" accusing Reynolds of confidentiality breaches when you apparently do not have the facts to justify that accusation.

Dylan I. Ballard | Partner
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From: Massaroni, Christopher <CMassaroni@hodgsonruss.com>
Sent: Friday, September 11, 2020 9:05 AM
To: Dylan Ballard <dballard@sheppardmullin.com>
Subject: RE: In re Dealer Management Systems Antitrust Litig., No. 1:18-cv-000864 (N.D. Ill.)

Dylan,
I have changed firms since the communications of May 2019 and do not have access to all our emails.

Please respond to provide me with copies of our full communications at that time.
Please also provide the CID or other request, if any, that Reynolds was responding to in May 2019.
I will respond more fully to your letter yesterday after a review of such material.
Thank you,
Chris

Christopher Massaroni

Partner
Hodgson Russ LLP

Tel: 518.433.2432

Fax: 518.391.2102



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From: Dylan Ballard <dballard@sheppardmullin.com>
Sent: Thursday, September 10, 2020 2:38 PM
To: Massaroni, Christopher <CMassaroni@hodgsonruss.com>
Cc: Leo Caseria <LCaseria@sheppardmullin.com>; Aundrea K Gulley <agulley@gibbsbruns.com>; Brian T. Ross <brross@gibbsbruns.com>; Miller, Britt M. <BMiller@mayerbrown.com>; Provance, Matthew D. <MProvance@mayerbrown.com>; Dorris, Daniel V. <ddorris@kellogghansen.com>; Amar Naik <ANaik@sheppardmullin.com>
Subject: In re Dealer Management Systems Antitrust Litig., No. 1:18-cv-000864 (N.D. Ill.)

External Email - Use Caution

Chris, please see the attached correspondence on behalf of Reynolds.

Best regards,

Dylan

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